

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	
ROGER L. TOSTEN	:	CASE NO. 1-20-00081-HWV
Debtor	:	CHAPTER 13
	:	
ROGER L. TOSTEN	:	
Movant	:	
	:	
v.	:	
	:	
JACK N. ZAHAROPOULOS, ESQUIRE	:	
FREEDOM MORTGAGE CORP.	:	
TRUIST BANK	:	
FRANKLIN CO. TAX CLAIM BUREAU	:	
Respondents	:	

**NOTICE OF MOTION, RESPONSE DEADLINE
AND SCHEDULED HEARING DATE**

Gary J. Imblum, Esquire, attorney for Roger L. Tosten, 8023 Molly Pitcher Hwy., Greencastle, PA, has filed a Motion to Sell Real Estate located at 8023 Molly Pitcher Hwy., Greencastle, PA Free and Clear of Liens to Bruce J. Martin and Carolyn S. Martin, non-relatives and non-insiders, in the amount of \$212,500.00. Settlement shall occur on or before November 30, 2021 at a location not yet determined.

YOUR RIGHTS MAY BE AFFECTED. YOU SHOULD READ THESE PAPERS CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY, IF YOU HAVE ONE IN THIS BANKRUPTCY CASE. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before, November 02, 2021, you or your attorney must do all of the following:

- (a) File an answer on or before November 02, 2021 explaining your position at
- UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA
THE RONALD REAGAN FEDERAL BUILDING
228 WALNUT STREET, ROOM 320
HARRISBURG, PA 17101**

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before 5:00 p.m. November 02, 2021; and

- (b) Mail a copy to the Movant's Attorney:

IMBLUM LAW OFFICES, P.C.

Gary J. Imblum
4615 Derry Street
Harrisburg, PA 17111
(717)238-5250; Fax (717)558-8990
Electronic Mail: gary.imblum@imblumlaw.com

2. The property to be sold may be examined at 8023 Molly Pitcher Hwy., Greencastle, PA at any time prior to the sale.
3. Arrangement to view the property may be made by calling Gary J. Imblum, Esquire at 717-238-5250.
4. The terms and conditions of the sale are as follows:
 - a. Pending offers: \$212,500.00;
 - b. Minimum bid requirements: \$212,500.00
5. The sale of real estate located at 8023 Molly Pitcher Hwy., Greencastle, PA is not subject to higher offers.
6. Advertisement of the sale shall be as follows: N/A.
7. Inquiries regarding the sale shall be directed to the following: Gary J. Imblum, Esquire, 717-238-5250
8. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.
9. A scheduled hearing on the motion will be held before the Honorable Henry W. Van Eck, on November 16, 2021 at 9:30 a.m. in the Bankruptcy Courtroom, Third Floor, the Ronald Reagan Federal Building, Third and Walnut Streets, Harrisburg, Pennsylvania. Unless the court orders otherwise, the hearing on this matter will be an evidentiary hearing at which witnesses may testify with respect to disputed material factual issues in the manner directed by Fed.R.Bankr.P. 9014(d).
10. If you do not file a response or objection within twenty one (21) days after the date of this notice, the hearing will not be held and an order will be entered granting the Motion for Sale.
11. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
12. You may contact the Bankruptcy Clerk's Office at 717-901-2800 or 570-826-6450 to find out whether the hearing has been canceled because no one filed an answer.

Dated: 10/12/2021

Gary J. Imblum, Esquire
4615 Derry Street
Harrisburg, PA 17111

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4 UNITED STATES BANKRUPTCY COURT
5 MIDDLE DISTRICT OF PENNSYLVANIA

6 IN RE:
7 ROGER L TOSTEN

CASE NO: 20-00081

**DECLARATION OF MAILING
CERTIFICATE OF SERVICE**

8 Chapter: 13
9 Judge: HWV
10 Hearing Date: 11/16/2021
11 Hearing Time: 9:30 a.m.
12 Response Date: 11/02/2021

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19 On 10/12/2021, I did cause a copy of the following documents, described below,
20 Notice of Motion, Response Deadline and Scheduled Hearing Date
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25 to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with
26 sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and
27 incorporated as if fully set forth herein.

28 I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.
com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to
Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if
fully set forth herein.

Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been
served electronically with the documents described herein per the ECF/PACER system.

DATED: 10/12/2021

/s/ Gary J. Imblum Esquire
Gary J. Imblum Esquire 42606

Imblum Law Offices PC
4615 Derry Street
Harrisburg, PA 17111
717 238 5250

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4 UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA

5 IN RE:
6 ROGER L TOSTEN

CASE NO: 20-00081

7 **CERTIFICATE OF SERVICE**
8 **DECLARATION OF MAILING**

9 Chapter: 13
10 Judge: HWV
Hearing Date: 11/16/2021
Hearing Time: 9:30 a.m.
Response Date: 11/02/2021

11 On 10/12/2021, a copy of the following documents, described below,
12 Notice of Motion, Response Deadline and Scheduled Hearing Date

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19 were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient
20 postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth
herein.

21 The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above
22 referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of
Service and that it is true and correct to the best of my knowledge, information, and belief.

23 DATED: 10/12/2021

24 

25 Jay S. Jump
26 BK Attorney Services, LLC
27 d/b/a certificateofservice.com, for
Gary J. Imblum Esquire
Imblum Law Offices PC
4615 Derry Street
Harrisburg, PA 17111

PARTIES DESIGNATED AS "EXCLUDE" WERE NOT SERVED VIA USPS FIRST CLASS MAIL
PARTIES WITH A '+' AND DESIGNATED AS "CM/ECF E-SERVICE" RECEIVED ELECTRONIC NOTICE THROUGH THE CM/ECF SYSTEM

CASE INFO

LABEL MATRIX FOR LOCAL NOTICING
03141
CASE 1-20-BK-00081-HWV
MIDDLE DISTRICT OF PENNSYLVANIA
HARRISBURG
TUE OCT 12 13-03-49 EDT 2021

BB AND T
PO BOX 1847
WILSON NC 27894-1847

BBT NOW TRUIST
PO BOX 1847
WILSON NC 27894-1847

BBT NOW TRUIST
PO BOX 1847
100-50-01-51
WILSON NC 27894-1847

DISCOVER
PO BOX 71084
CHARLOTTE NC 28272-1084

DISCOVER BANK
DISCOVER PRODUCTS INC
PO BOX 3025
NEW ALBANY OH 43054-3025

DISCOVER FINANCIAL SERVICES LLC
PO BOX 3025
NEW ALBANY OH 43054-3025

FREEDOM MORTGAGE CORPORATION
CO ROUNDPOINT MORTGAGE SERVICING
446 WRENPLACE ROAD
FORT MILL SC 29715-0200

FREEDOM MORTGAGE CORPORATION
CO ROUNDPOINT MORTGAGE SERVICING
446 WRENPLACE ROAD
FORT MILL SC 29715

~~EXCLUDE~~

~~GARY J IMBLUM
IMBLUM LAW OFFICES PC
4615 BERRY STREET
HARRISBURG PA 17111 2660~~

INTERNAL REVENUE SERVICE
POB 7346
PHILADELPHIA PA 19101-7346

LOWES BUSINESS ACCOUNTS
POB 965004
ORLANDO FL 32896-5004

MCCABE WEISBERG CONWAY PC
123 SOUTH BROAD STREET
SUITE 1400
PHILADELPHIA PA 19109-1060

PETER E MELTZER
WEBER GALLAGHER SIMPSON STAPLETON FIRES
2000 MARKET STREET 13TH FLOOR
PHILADELPHIA PA 19103-3204

MOONEY ASSOC
230 YORK STREET
HANOVER PA 17331-3270

LAUREN MARIE MOYER
MCCABE WEISBERG CONWAY LLC
123 S BROAD ST
SUITE 1400
PHILADELPHIA PA 19109-1060

ONEMAIN FINANCIAL
PO BOX 1010
EVANSVILLE IN 47706-1010

ONEMAIN FINANCIAL
PO BOX 3251
EVANSVILLE IN 47731-3251

PA DEPARTMENT OF REVENUE
ATTN BANKRUPTCY DIVISION
DEPT 280946
HARRISBURG PA 17128-0946

PRA RECEIVABLES MANAGEMENT LLC
PO BOX 41021
NORFOLK VA 23541-1021

PENNSYLVANIA DEPARTMENT OF REVENUE
BANKRUPTCY DIVISION
PO BOX 280946
HARRISBURG PA 17128-0946

SHAFFER EQUIPMENT
PO BOX 976
CHAMBERSBURG PA 17201-0976

REBECCA ANN SOLARZ
KML LAW GROUP PC
701 MARKET ST
SUITE 5000
PHILADELPHIA PA 19106-1541

STATE FARM BANK
3 STATE FARM PLAZA N3
ATTN CUSTOMER CARE GROUP
BLOOMINGTON IL 61791-0002

STATE FARM BANK FSB
CO
MCCABE WEISBERG CONWAY LLC
123 SOUTH BROAD STREET SUITE 1400
PHILADELPHIA PA 19109-1060

STATE FARM BANK FSB
CO CENLAR FSB
ATTENTION- BK DEPARTMENT
425 PHILLIPS BLVD
EWING NJ 08618-1430

SYNCHRONY BANK
CO PRA RECEIVABLES MANAGEMENT LLC
PO BOX 41021
NORFOLK VA 23541-1021

PARTIES DESIGNATED AS "EXCLUDE" WERE NOT SERVED VIA USPS FIRST CLASS MAIL
PARTIES WITH A '+' AND DESIGNATED AS "CM/ECF E-SERVICE" RECEIVED ELECTRONIC NOTICE THROUGH THE CM/ECF SYSTEM

DEBTOR

ROGER L TOSTEN
8023 MOLLY PITCHER HIGHWAY
GREENCASTLE PA 17225-9223

~~EXCLUDE~~

~~UNITED STATES TRUSTEE
220 WALNUT STREET SUITE 1190
HARRISBURG PA 17101-1722~~

~~EXCLUDE~~

~~JACK N ZAHAROPoulos
ATTN CHAPTER 13 TRUSTEE
0125 ADAMS DRIVE SUITE A
HUMMELSTOWN PA 17036-0625~~

ADDRESSES WHERE AN EMAIL IS PRESENT WERE SERVED VIA "CM/ECF E-SERVICE" THROUGH THE UNITED STATES BANKRUPTCY COURT'S NOTICE OF ELECTRONIC FILING ("NEF") SYSTEM.

(Trustee)
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036

info@pamd13trustee.com

United States Trustee
228 Walnut Street, Suite 1190
Harrisburg, PA 17101
(Asst. U.S. Trustee)

ustpregion03.ha.ecf@usdoj.gov

Roger L. Tosten
8023 Molly Pitcher Highway
Greencastle, PA 17225
(Debtor 1)
represented by:
Gary J Imblum
Imblum Law Offices, P.C.
4615 Derry Street
Harrisburg, PA 17111

gary.imblum@imblumlaw.com

(Creditor)
TRUIST BANK
represented by:
Peter E Meltzer
Weber Gallagher Simpson Stapleton
Fires
2000 Market Street, 13th Floor
Philadelphia, PA 19103

bankruptcy@wglaw.com

Ann E. Swartz
Chapter 13 Trustee's Office - Reading
2901 St. Lawrence Ave
Suite 100
Reading, PA 19606

ecfmail@readingch13.com

(Creditor)
State Farm Bank, F.S.B.
represented by:
Lauren Marie Moyer
McCabe, Weisberg & Conway, LLC
123 S. Broad St.
Suite 1400
Philadelphia, PA 19109

ecfmail@mwc-law.com

(Creditor)
PRA Receivables Management, LLC
PO Box 41021
Norfolk, VA 23541

claims@recoverycorp.com

Rebecca Ann Solarz
KML Law Group, P.C.
701 Market St.
Suite 5000
Philadelphia, PA 19106

bkgroup@kmlawgroup.com

(Creditor)
FREEDOM MORTGAGE CORPORATION
represented by:
Lauren Marie Moyer
McCabe, Weisberg & Conway, LLC
123 S. Broad St.
Suite 1400
Philadelphia, PA 19109

ecfmail@mwc-law.com

Charles J DeHart, III (Trustee)
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(Former Trustee)

dehartstaff@pamd13trustee.com

(Creditor)
BB&T now Truist
P.O. Box 1847
100-50-01-51
Wilson, NC 27894